

1 WAYNE A. SHAFFER (SBN 1519)
2 LAXALT & NOMURA, LTD.
3 9600 Gateway Drive
4 Reno, NV 89521
5 Telephone: (775) 322-1170
6 Facsimile: (775) 322-1865

7 RAYMOND D. JAMIESON, Bar No. 1027076
8 QUARLES & BRADY LLP
9 411 East Wisconsin Avenue Suite 2350
10 Milwaukee, WI 53202-4426
11 Telephone: (414) 277-5000
12 Facsimile: (414) 271-3552

13 Attorneys for Defendant
14 The RAYMOND CORPORATION

15 UNITED STATES DISTRICT COURT
16 DISTRICT OF NEVADA

17 STAN KARAS,
18
19 Plaintiff,

20 v.

21 THE RAYMOND CORPORATION,
22 DOES 1 through 50; and ROE
23 CORPORATIONS 51 through 100,
24 Defendants.

Case No. 2:13-cv-01696-MMD-PAL

**JOINT MOTION EXTENDING
DEADLINE TO FILE DISPOSITIVE
MOTIONS**

(First Request)

25 Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and L. R. 6-1 and 26-4, the parties, by and through
26 their respective counsel, jointly move for a short -- fourteen (14) day -- extension of the deadline
27 to file dispositive motions set forth in the Court's November 5, 2013 Order (Doc. # 15), moving
28 that deadline from August 20, 2014 to September 3, 2014.

Good cause exists for this extension, as the parties have diligently pursued discovery, including completing several depositions and exchanging multiple sets of interrogatories and requests for production, but are in the process of settlement negotiations and would like to complete their efforts to settle the matter before undertaking efforts to put together any

dispositive motions. Further, the attorneys for the parties have obligations and scheduling conflicts, including depositions out of state, that will make compliance with the August 20, 2013 deadline extremely difficult.

Accordingly, the parties jointly request that the Court extend the August 20, 2014 deadline to file dispositive motions to September 3, 2014.

DATED this 11th day of August, 2014.

DATED this 11th day of August, 2014.

HENNESS & HAIGHT

LAXALT & NOMURA, LTD.

By /s/ Derek K. Muaina

MARK G. HENNESS (SBN 5842)
DEREK K. MUAINA (SBN 12456)
8972 Spanish Ridge Avenue
Las Vegas, Nevada 89148

By /s/ Wayne A. Shaffer

WAYNE A. SHAFFER (SBN 1519)
9600 Gateway Dr.
Reno, Nevada 89521

and

Attorneys for Plaintiff

Raymond D. Jamieson
Quarles & Brady LLP
411 East Wisconsin Avenue, Suite 2350
Milwaukee, Wisconsin 53202-4426

Attorneys for Defendant

ORDER I

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated: August 11, 2014